



## City of Southfield

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September 7, 2007

Representative Andrew Meisner, Chairman  
House Commerce Committee  
House Office Building  
P. O. Box 30014  
Lansing, Michigan 48909

RE: House Bills 4770, 4771 and 4772

Chairman Meisner and Honorable members of the House Commerce Committee:

I would like to register my **support** for proposed **House Bills 4770, HB 4771 and HB 4772**. I apologize that I was not able to attend the hearing today, September 11, 2007. My inability to attend is due to a prior business commitment for the International Code Council. I respectfully request that since I am not able to attend the hearing to express my support; please accept the following as a brief statement of my views of the legislation from a Code Official who is Certified in his profession and has been involved in the administration and development of codes and standards on a state and national level for over 27 years. I as a code official for a local community have nothing to gain or lose by the success or failure of this legislation. But as an independent party I have come forward to urging you to pass this legislation as you did in 2005.

These three pieces of legislation correct a wrong that was made many years ago. As proposed this legislation allows for **all** design professionals to completely practice their professions. This proposed legislation does not limit or restrict an architect or engineer in practicing their profession, but it does open the door to allow an interior designer that has proven their competency by passing an examination of their knowledge and abilities to completely practice their profession. This legislation will allow persons that perform interior design services to be recognized as professionals and finally able to submit plans for construction permits based on a limited scope of professional practice, clearly defined within the legislation you are considering. The previous language of P.A. 299, Section 601, subsection 10 was very poorly written and left open to a wide range of interpretations, most of which resulted in a restraint of practice.

If the concept of someone being licensed or registered provided such a degree of safety to the public then why are we as Code Officials still reviewing their documents for compliance? Most importantly why am I still asking for corrections? Why do I still call

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Architects or Engineers to discuss a project and find that they don't even have a current code book? Having a registration or license as an architect or engineer hasn't demonstrated competency or a lack thereof. It just allows them to "practice" their profession.

An architect or engineers ability to one time pass an exam doesn't mean they will display or discharge their responsibilities as a design professional competently. I'm sure that the same will be able to be said for Interior Design persons in the years to come. Again, the adequacy of construction documents to conform to building code is left to the determination of the Code Official, not just that it bears a required seal and signature from a registered design professional. The marketplace should and will balance the number of persons practicing these services; most often an incompetent design professional doesn't continue to practice very long. Weak ones use the approval system as a crutch and we the code officials and inspector at the local jurisdictions are frustrated with that. Passing this package of legislation will at least level the field for those that are competent to practice and fully work within the marketplace of this state's construction economy.

What is contained in HB 4772 more clearly defines that the alteration or planning of new interior spaces can be done and submitted for permit by someone clearly certified or qualified as an "Interior Designer". As a code official for 27+ years I have seen construction documents prepared by Architects, Engineers and "Interior Designers" some of whom may be present at the hearing today. Many of these documents produced by any and all of the three groups have been acceptable to issue a permit and many have not for the scope of work that the plans represented. Code compliance is part of the process of construction and initially placed in the hands of the "registered design professionals" compliance is then left to best be determined by the Code Officials of this state through a plan review of those construction documents prior to issuing a permit, the final review is through regular inspection of work as it progresses in a project. The elements of the building code encompassed in the level of work that would be permitted by this recognition is reasonable and does not inherently create unsafe conditions for the public that would live, work or recreate in these spaces.

This legislation opens an avenue for economic growth and entrepreneurship that doesn't currently exist. It presents job opportunities for students at our colleges and universities, instead of them looking outside of our state upon their graduation. It is a self funded program for enforcement or budget neutral. Let the other design professionals and regulated professions step up to increase registration or licensure fees so enforcement of their rules and regulations are budget neutral. Instead allowing enforcement efforts be drains on the budget or worse yet have those rules and regulations not enforced due to no funding. That is harmful to the public's health, safety and welfare!

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If any questions are raised that you think I can provide input on please contact me at my office. Again, I did very much desire to attend the hearing so I could express my support in person and respond to any questions from committee members or respond to misleading information that may be presented.

Thank you, for your consideration of my opinion of SUPPORT for HB 4770, 4771 and 4772.

Sincerely,

A handwritten signature in black ink that reads "Wayne R. Jewell CBO". The signature is fluid and cursive, with the initials "CBO" written in a slightly different style at the end.

Wayne R. Jewell, CBO  
Building Official  
City of Southfield  
wjewell@cityofsouthfield.com  
(248) 796-4110

cc: Representative Paul Condino  
Representative Bill Huizenga